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June 22, 2022

BY ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Arguedas (Denise Bullock), 20 Cr. 135


Dear Judge Furman:

We respectfully move for leave to file certain of defendant Denise Bullock's medical records under seal. *See* Individual Rules and Practices in Criminal Cases ¶¶ 10(D)(i); 10(C)(ii)-(iii). The single document [REDACTED]. This document is Exhibit C to Ms. Bullock's sentencing submission that was filed this evening.

This Court routinely permits the filing of medical records under seal. *See, e.g., United States v. Galdieri*, No. 19-CR-757-2 (JMF), 2022 WL 2118539, at *1 (S.D.N.Y. Jun. 13, 2022) (keeping defendant's medical records under seal); *United States v. Christopher Bullock*, No. 18-CR-528 (JMF), 2021 WL 1550424, at *1 n.2 (S.D.N.Y. Apr. 20, 2021) (granting motion to file medical records under seal). Because this document consists almost entirely of [REDACTED], redaction is impracticable and would not serve the public interest. *Cf. Dilworth v. Goldberg*, No. 10-CV-2224 (JMF), 2014 WL 3798631, at *2 n.3 (noting proper redaction of medical records and directing Clerk of the Court "to maintain the unredacted records under seal").

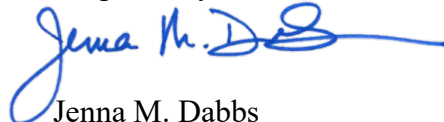
Application GRANTED. The Clerk of Court is directed to terminate ECF No. 701.

SO ORDERED.



June 23, 2022

Respectfully submitted,



Jenna M. Dabbs
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